

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FORT WORTH EMPLOYEES'	:	Civil Action No. 1:09-cv-03701-JPO-JCF
RETIREMENT FUND, On Behalf of Itself and	:	
All Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	DECLARATION OF DANIEL S.
	:	DROSMAN IN SUPPORT OF PLAINTIFFS'
vs.	:	MOTION FOR CLASS CERTIFICATION
	:	AND APPOINTMENT OF CLASS
J.P. MORGAN CHASE & CO., et al.,	:	REPRESENTATIVES AND CLASS
	:	COUNSEL
Defendants.	:	
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I, DANIEL S. DROSMAN, declare as follows:

1. I am an attorney admitted to practice before this Court, and I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, counsel of record for plaintiffs in the above-entitled action. I submit this Declaration in support of Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached are true and correct copies of the following exhibits:

- Exhibit 1: Expert Report of Joseph R. Mason, dated September 27, 2013;
- Exhibit 2: *In re Wells Fargo Mortg.-Backed Certificates Litig.*, No. 5:09-cv-01376-LHK, Final Judgment and Order of Dismissal With Prejudice (N.D. Cal. Nov. 14, 2011);
- Exhibit 3: Excerpt from J.P. Morgan Mortgage Trust 2007-S3 Prospectus Supplement, dated August 2, 2007, JPMS-FW-00002335-701;
- Exhibit 4: Excerpt from J.P. Morgan Acquisition Trust 2007-CH4 Prospectus Supplement, dated June 7, 2007, JPMS-FW-00029139-428;
- Exhibit 5: J.P. Morgan Securitization Overview, dated August 2006, JPMC\_DEX\_002919682-718;
- Exhibit 6: Excerpts from the deposition transcript of Paul White, dated September 13, 2013 [FILED UNDER SEAL];
- Exhibit 7: J.P. Morgan report for quarterly seller review meeting, dated May 15, 2007, JPMS-FW-00032599-689 [FILED UNDER SEAL];
- Exhibit 8: S&P Conduit Questionnaire, dated May 11, 2007, JPMS-FW-00032239-59 [FILED UNDER SEAL];
- Exhibit 9: Moody's Mortgage Metrics: A Model Analysis of Residential Mortgage Pools, dated April 1, 2003;
- Exhibit 10: Firm resume of Robbins Geller Rudman & Dowd LLP;
- Exhibit 11: Excerpts from the deposition transcript of Seth Fenton, dated September 12, 2013 [FILED UNDER SEAL]; and

Exhibit 12: Excerpts from the Deposition of William Buell, dated January 29, 2013, *Dexia SA/NV v. Bear Stearns & Co., Inc.*, No. 12-cv-1761 (JSR) (S.D.N.Y.), JPMS-FW-00031333-451 [FILED UNDER SEAL].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 27th day of September, 2013, at San Diego, California.

s/ DANIEL S. DROSMAN

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DANIEL S. DROSMAN

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 27, 2013.

s/ DANIEL S. DROSMAN  
DANIEL S. DROSMAN

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### Manual Notice List

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